

MONEY LAUNDERING.COM
15th Annual International Anti-Money Laundering Conference
 March 15-17, 2010 | The Westin Diplomat | Hollywood, Florida

**ADOPTING BEST PRACTICES TO
 MANAGE EXAMINATIONS BY
 MULTIPLE REGULATORS**

Diane Horn
AML Officer
 Northwestern Mutual Investment Services LLC
 Northwestern Mutual Wealth Management Company

March 16, 2010

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Northwestern Mutual

- Mutual Insurance Company Founded In 1857
- Broker/Dealer & Investment Advisor – Dual Registrant
- Trust Company – Investment Advisor
- \$115 Billions In Assets
- Licensed In All 50 States
- 350 Offices Across The U.S.

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Business Background (continued)

- Financial Representatives – 9,000
- Registered Representatives – 8,000
- Financial Advisors – 2,000
- Products & Services – Life Insurance, Long Term Care, Disability Income, Mutual Funds, Financial Planning, Trust, Investment Management and Advisory

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Enterprise AML Program

- AML Compliance Officers
 - Each Entity Has An AML Officer
- AML Committee
 - Comprised of AML Officers And Personnel from various business units and operating subsidiaries
 - Oversight of AML, CIP and OFAC Programs

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AML Committee (continued)

- Oversees Training Requirements
- Directs the course of action to be taken based upon regulatory changes, industry enforcement actions, regulatory exam concerns
- Recommends enhancements to Program, processes and systems
- Oversees product/process risk assessment

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AML Program (continued)

- AML Automated Transaction Review
 - Business Areas Responsible for Monitoring
- Special Investigation Unit
 - Centralized Case Management
 - Complex case investigations and recommendations

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AML Regulators

- IRS – Insurance Company
- SEC – Broker/Dealer
- FINRA – Broker Dealer
- OTS – Trust Company

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Recent Exam Experiences

- Dedicated Exam Team
 - Experience With All Regulators
- Focus/Hot topics
 - CIP Processes
- Case studies
 - Every Regulator's Exam Approach is Different

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Adopting Best Practices

Staying Ahead of the Curve

- Enterprise Approach
 - Efficiencies in staffing, training, issue identification/resolution

Challenges

- Different businesses/different rules

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